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Federal Communications Commission
Office of the Secretary



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October 10, 2007

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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Re: Petitions of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence, and Virginia Beach Metropolitan Statistical Areas, WC Docket No. 06-172

Dear Ms. Dortch:

In response to a staff request, in this filing we provide additional data relating to competition from facilities-based providers and competitors' use of UNEs versus Verizon's Wholesale Advantage and Special Access services for DS0, DS1, and DS3 level services for each of the MSAs for which Verizon seeks forbearance. Much of this data was filed in the Commission's proceeding on Special Access, WC Docket No. 05-25, and we have included it here as it relates to competition in these six MSAs. Specifically, we submit the following from that proceeding:

- Attachment G: Profiles Of Competitive Providers Of High-Capacity Services. These profiles describe competitors' service offerings more generally but include competitors operating in these six MSAs.
- Attachment H: Maps Depicting CLEC Competitive Fiber Routes, CLEC Lit Buildings and Wireless Cell Sites. We have included current maps for each of the six MSAs for which Verizon's seeks forbearance. As with the maps originally submitted in *Special Access Rates for Price Cap Local Exchange Carriers*, WC Docket No. 05-25, these maps include fiber route data from GeoTel, but also include lit building data from GeoResults, AT&T, and another competitor.

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- Attachment I: Websites Of Competitive Providers Of High-Capacity Services. This data shows that competitors are offering mass market and high-capacity, comparable to Verizon's special access services, in each of the MSAs for which Verizon seeks forbearance from unbundling obligations. We are also supplementing Attachment I with additional information from competitors' websites as it relates directly to competition in these six MSAs. This additional data is collected in Attachment I (Supplement) attached hereto.

In addition, for each of the six MSA for which Verizon seeks forbearance from unbundling relief, we have extracted the following data from exhibits Verizon' filed in support of Verizon's comments in the Commission's proceeding on Special Access.

- Exhibit 1: Carriers That Have Deployed Known Fiber Transport. This data identifies, based on information obtained from GeoTel, competitors that have deployed known fiber transport facilities and quantifies their known fiber route miles in each of the six MSAs for which Verizon seeks forbearance.
- Exhibit 2: Number of Known Buildings to which Competitive Carriers Have Deployed Fiber-Based Equipment in Verizon ILEC Territory. This data identifies, based on information obtained from Georeports and lit building lists provided by AT&T and another competitor, competitors that have deployed known facilities to buildings and quantifies the number of known competitor lit buildings and circuits. The same data filed in the Special Access proceeding was based solely on Georeports data.
- Exhibit 3: Number of Locations Served by Selected Competing Carriers Using Verizon Special Access. This data shows that, in each of the MSAs in which Verizon seeks forbearance from unbundling requirements, a number of selected carriers compete successfully using Verizon's special access services.

In addition to this data, at staff's request, we are updating as described below Exhibit 10, filed in Verizon's Reply Comments submitted with this proceeding to include services purchased by all carriers in each MSA for which Verizon seeks forbearance and to include DSOs.

- Exhibit 10 Supplement: Competing Carrier's Use of Verizon's Special Access and UNEs by MSA (Selected Carriers). This data shows for each MSA that although some carriers rely extensively on UNEs, most carriers rely predominately on Verizon's Wholesale Advantage and Special Access services to compete and do not rely extensively on UNEs, including unbundled DSOs, in the six MSAs for which Verizon's seeks forbearance.

Verizon has provided DS0 volumes in Exhibit 10 Supplement for each MSA. The proper analysis of DS0 services in these markets must include all comparable products that CLECs use to provide voice grade services to customers, including not only special

access and UNE Loop DSOs, but also Verizon's Wholesale Advantage services (UNE-P replacement) offered under commercial agreements.

Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Joseph Jackson". The signature is written in a cursive style with a long, sweeping underline.

cc: Marcus Maher
Jeremy Miller
Tim Stelzig

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DOCKET NO. 06-172

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o This document is confidential (NOT FOR PUBLIC INSPECTION)
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